

EXHIBIT U

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In the Matter of:

THE STATE OF WASHINGTON

vs.

THE GEO GROUP, INC.

IOLANI MENZA

June 27, 2019



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IOLANI MENZA; June 27, 2019

1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE STATE OF WASHINGTON,)	
)	
Plaintiff,)	
)	
vs.)	No. 3:17-cv-05806-RJB
)	
THE GEO GROUP, INC.,)	SOME OF THE EXHIBITS AND
)	TESTIMONY HAVE BEEN
Defendant.)	DESIGNATED AS
)	CONFIDENTIAL
)	

DEPOSITION UPON ORAL EXAMINATION
OF
IOLANI MENZA

9:54 a.m.
June 27, 2019

1250 Pacific Avenue 105
Tacoma, Washington 98401-2317



REPORTED BY: JACQUELINE L. BELLOWS, CCR 2297



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Tacoma, Washington; June 27, 2019

9:54 a.m.

--oOo--

IOLANI MENZA,

sworn as a witness by the certified court reporter,

testified as follows:

E X A M I N A T I O N

BY MS. CHIEN:

Q. Can you say your name for the record?

A. Iolani Menza.

Q. Iolani Menza, that will help me be able to pronounce it correctly. My name is Marsha Chien. I represent the State of Washington. And we're about to take your deposition. And is there anything that would cause you concern that you wouldn't be able to my questions accurately?

A. No.

Q. Have you had your deposition taken before?

A. I was in court once. I've never been in a room like this.

Q. With a court reporter or anything like that? You've never been in a room with a court reporter --

A. No.



1 MS. ASAI: Object to the form.

2 A. It didn't change.

3 Q (By Ms. Chien) Did you have to work harder?

4 MS. ASAI: Object to the form.

5 A. I still did the laundry. I didn't work harder
6 or not harder. It's just the same thing as every day.

7 Q. So there are three or four detainee workers
8 generally on the laundry shift. What was each detainee
9 assigned?

10 A. There was no specific jobs assigned.
11 Everybody would just do whatever they wanted, basically.
12 If you wanted to fold or put away clothes, you'd put
13 away clothes. If you wanted to wash clothes, you'd wash
14 clothes. I mean . . .

15 Q. So when you came -- when detainee workers
16 came, they could decide what they would work on?

17 A. Pretty much what we had to get done is what
18 the task was. So if he wanted to load 'cause he likes
19 loading, he would load. If he likes to unload 'cause he
20 likes unloading, he would unload. I can't tell you --

21 Q. Did you tell -- who told them what they had to
22 do that day?

23 A. That would be me.

24 Q. The laundry officer tells the detainee workers
25 what they need to do each day?



1 A. Yeah.

2 Q. But then there were also new detainee workers
3 that came on while you were laundry officer; is that
4 right?

5 A. Yes.

6 Q. How did you get those new detainee workers?

7 A. I had a list of individuals that were on the
8 standby waiting list. I called their officer at the pod
9 they stayed in and had their officer ask them if they
10 would like to work with me in the laundry room. They
11 either said yes or no.

12 Q. Did you ever get to choose which detainee
13 workers you would prefer to work in the laundry?

14 A. The process is the way I called for workers.
15 I never chose.

16 Q. Did you have any preferences? Like if you
17 could choose, were there some detainee workers that were
18 better than others?

19 A. I would just go by the list. So . . .

20 Q. I mean about their work product, how they
21 worked. They all worked the same?

22 A. No. They -- everybody has different
23 personalities. Everybody is different. As long as they
24 got the job done, that's fine with me.

25 Q. Did you ever have to call classification to



1 had a couple questions. It says "laundry POA." Does
2 "POA" mean anything to you?

3 A. I have no clue what that means.

4 Q. Are you familiar with a detainee worker by the
5 last name of Medina?

6 MS. ASAI: I'll object. We'll be marking
7 portions of the transcript as confidential when we're
8 naming detainees.

9 You can answer.

10 A. (Shrugs.)

11 Q (By Ms. Chien) No?

12 A. Sorry. I'm sure that's not a unique name.

13 Q. Who hires laundry detainee workers?

14 A. Like I said, I just go off the list. So
15 whatever's on the list is who I call their officer and
16 see if they want to work. I don't hire any individuals.
17 They're on the list, waiting to be -- it's not up to me
18 to hire or -- you know what I mean?

19 Q. Yeah. Okay. I'm going to hand you a document
20 I'd like to be marked as Exhibit 227.

21 (Deposition Exhibit No. 227 marked for
22 identification.)

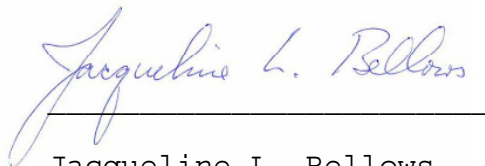
23 Q (By Ms. Chien) Do you see that this is an
24 email from Mike Heye, dated May 15, 2017? It says "The
25 laundry officers do the hiring," the first line after



REPORTER'S CERTIFICATE

I, JACQUELINE L. BELLOWS, the undersigned
Certified Court Reporter pursuant to RCW 5.28.010 authorized
to administer oaths and affirmations in and for the State of
Washington, do hereby certify that the sworn testimony
and/or proceedings, a transcript of which is attached, was
given before me at the time and place stated therein; that
any and/or all witness(es) were duly sworn to testify to the
truth; that the sworn testimony and/or proceedings were by
me stenographically recorded and transcribed under my
supervision, to the best of my ability; that the foregoing
transcript contains a full, true, and accurate record of all
the sworn testimony and/or proceedings given and occurring
at the time and place stated in the transcript; that a
review of which was requested; that I am in no way related
to any party to the matter, nor to any counsel, nor do I
have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this 1st
day of July, 2019.



Jacqueline L. Bellows
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